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2           **KATHLEEN S. RIVERA, DEPUTY (211606)**  
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10          **Attorneys for Defendants**

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12          **UNITED STATES DISTRICT COURT**  
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14          **EASTERN DISTRICT OF CALIFORNIA**

15          C.R., and D.R., by and through their Guardian  
16          ad Litem, JESSICA MENDOZA; U.R., by and  
17          through her Guardian ad Litem, FELIZ  
18          GOMEZ, Individually, and as Successors in  
19          Interest to DANIEL DAVID REYES; and ANN  
20          CADENA, individually,

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22          **Plaintiff,**

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24          **vs.**

25          **COUNTY OF KERN, a legal subdivision of the**  
26          **State of California; PHILIPPE TAMPINCO,**  
27          **an individual; and Does 1 through 10, inclusive,**

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29          **Defendant.**

30          **Case No. 1:21-CV-01593-ADA-CDB**

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32          **STIPULATION TO CONTINUE**  
33          **MANDATORY SETTLEMENT**  
34          **CONFERENCE; ORDER THEREON**

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36          **MSC Date: 04/03/2023**

37          **Time: 1:00 p.m.**

38          **Trial Date: 01/09/2024**

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40          Plaintiffs, C.R. and D.R. by and through their Guardian Ad Litem, JESSICA  
41          MENDOZ; U.R. by and through her Guardian Ad Litem, FELIZ GOMEZ and ANN  
42          CADENA, and Defendants, COUNTY OF KERN, DEPUTY and PHILIPPE TAMPINCO,  
43          have met and conferred through their respective attorneys of record, and hereby Stipulate as  
44          follows:

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46          1.       The Mandatory Settlement Conference (“MSC”) in this matter is currently set  
47          before Magistrate Judge, Erica P. Grosjean, on April 3, 2023 at 1:00 p.m. in Courtroom 10;

2. Counsel for Defendant will start Trial in another matter on April 10, 2023 and will not be available for the Mandatory Settlement Conference currently set for April 3, 2023, due to preparations for trial, and a continuance of the hearing is necessary.

3 Therefore, Plaintiff and Defendants stipulate that the Court continue the MSC set for April 3, 2023, to a date/time in June 2023, which is convenient to the Court.

Dated: March 13, 2023 MARGO A. RAISON, COUNTY COUNSEL

MARGO A. RAISON, COUNTY COUNSEL

Dated: March 13, 2023 GUIZAR, HENDERSON & CARRAZCO, LLP.

By: /s/ Christian Contreras as authorized on 03/14/2023  
Christian Contreras, Esq.  
Attorneys for Plaintiffs, C.R, D.R. and  
ANN CADENA

#26L6050.DOC

## **DECLARATION OF KATHLEEN S. RIVERA**

I, KATHLEEN RIVERA, declare:

1. I am a Deputy County Counsel for the County of Kern, representing the County Defendants in this matter. I am assigned the responsibility of handling this case and I make this declaration in such capacity and in the course and scope of my duties. I could and would testify competently as to the following facts.

2. I am currently scheduled for Trial in the matter of *Rhonda Hagood, et al. v. County of Kern, et al.*, on April 10, 2023, at 8:30 a.m., in Bakersfield Federal Court before the Honorable Christopher D. Baker and will be unavailable for the Mandatory Settlement Conference set in this matter on the same date.

3. The parties stipulate that good cause exists for this continuance and that a continuance of the Mandatory Settlement Conference is necessary due to my having to prepare for trial in another matter, which is to start April 10, 2023.

4. The parties respectfully request the court continue the Mandatory Settlement Conference to a date and time in June 2023 convenient to the court.

Executed this 13th day of March 2023, in Bakersfield, California.

By: /s/ Kathleen S. Rivera

Kathleen Rivera, Declarant

1 ORDER  
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3 The court, having considered the Stipulation of the parties and the Declaration of  
4 Kathleen Rivera, finding good cause to continue the Mandatory Settlement Conference,  
5 ORDERS as follows:

6 The Mandatory Settlement Conference currently scheduled for April 3, 2023, shall be  
7 continued to June 13, 2023, at 1:00 p.m., via zoom.

8 IT IS SO ORDERED.  
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10 Dated: March 22, 2023

11 /s/ *Eric P. Groj*  
12 UNITED STATES MAGISTRATE JUDGE  
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